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**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

KERRI L. VAN HORN,

Plaintiff,

vs.

ACCTCORP OF SOUTHERN NEVADA,  
BANK OF AMERICA, N.A., CAPITAL  
ONE, FORD MOTOR CREDIT COMPANY,  
LLC, CITIBANK, and EXPERIAN  
INFORMATION SOLUTIONS, INC.,

Defendants.

Case No. 2:15-cv-02345-RFB-CWH

**STIPULATION FOR EXTENSION  
OF TIME FOR DEFENDANT  
FORD MOTOR COMPANY, LLC  
TO FILE ITS REPLY IN  
SUPPORT OF ITS RENEWED  
MOTION TO DISMISS**

**(FIRST REQUEST)**

COMES NOW, Defendant Ford Motor Credit Company, LLC (“Defendant”), and Plaintiff Kerri L. Van Horn (“Plaintiff”), by and through their respective counsel, and hereby submit this Stipulation for Extension of Time for Defendant Ford Motor Credit Company, LLC to File Its Reply In Support Of Its Renewed Motion to Dismiss.

WHEREAS, this case was removed to this Court on December 9, 2015 (Dkt. #1);

WHEREAS, Defendant filed its Motion to Dismiss on December 21, 2015 (Dkt. #14);

WHEREAS, Plaintiff filed her Amended Complaint January 7, 2016 (Dkt. #19);

WHEREAS, Defendant filed its Renewed Motion to Dismiss on January 20, 2016 (Dkt.

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1 #23);

2 WHEREAS, Plaintiff filed its Opposition to Defendant's Motion to Dismiss on February  
3 5, 2016 (Dkt. #35);

4 WHEREAS, Defendant's current deadline to reply is February 15, 2015;

5 WHEREAS, the Parties have stipulated that Defendant shall have up to and including  
6 February 29, 2016, to file its reply;

7  
8 WHEREAS, Defendant is in the process of obtaining the proper documents in order to  
9 address specific issues and arguments raised in Plaintiff's Amended Complaint and Opposition  
10 to Defendant's Renewed Motion to Dismiss. The facts contained in those documents will inform  
11 Defendant which legal arguments it may appropriately raise in its reply;

12 WHEREAS, this is Defendant's first request for an extension of this deadline.

13  
14 THEREFORE, in consideration of the foregoing, and for good cause, IT IS HEREBY  
15 STIPULATED AND AGREED by and between the Parties as follows:

- 16 (1) The current deadline, of February 15, 2016, to reply to Plaintiff's Opposition to Defendant's  
17 Motion to Dismiss is hereby vacated;

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(2) Defendant shall have up to and including February 29, 2016, to file its Reply In Support Of  
Its Renewed Motion to Dismiss.

**IT IS SO STIPULATED.**

DATED this 12<sup>th</sup> day of February, 2016.

/s/ Michael Kind  
Michael Kind  
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*Attorneys for Defendant*

**IT IS SO ORDERED.**

DATED this 15th day of February, 2016.

  
\_\_\_\_\_  
RICHARD F. BOULWARE, II  
United States District Judge

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